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Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Draft Field Treatability Study, GAC Treatment System, South Walnut Creek IM/IRA, OU 2 - 903 Pad, Mound, and East Trenches

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division believes this draft has met most of the goals for the document. However, we have the following concerns:

1) Section 3.0 of the document needs to be expanded to more completely discuss the treatability results. The purpose of this document is to study the ability of the GAC to remove organics found in the influent. A lot of effort is expended discussing the influent water quality and how the concentrations of contaminants were lower than expected. However, we want to see a discussion of the effluent water quality and how many times the ARARs were exceeded.

2) Within Section 3.0, the following errors were found:

Section 3.1: Contrary to text in the first paragraph, the detection limit for carbon tetrachloride is 1 ug/l.

Table 3.3-1: The second footnote is inappropriate. The ARARs for this IM/IRA were set forth in the IM/IRA decision Document, not the Phase I Workplan.

Table 3.4-1: Some of the ARARs (and TBCs) presented on this table are incorrect. Those that need revision are:

Antimony	0.064 mg/l TBC	Cadmium	0.005 mg/l
Copper	0.025 mg/l	Lead	0.005 mg/l
Mercury	0.0002 mg/l	Molybdenum	No standard
Nickel	0.04 mg/l	Vanadium	0.1 mg/l TBC
Zinc	No standard		

The standards for cobalt and lithium should be listed as TBC.

In addition, it is unclear where the ARAR listed for tin came from since tin is not on the ARAR list in the IM/IRA Decision Document. Also, two values for strontium are listed, one for dissolved and one for total strontium. Since the Division asked that the background value be used, we assume that these are the relative background values for dissolved and total strontium. If so, this needs to be clarified with a footnote.

Because the DOE comments to the document were included in the submittal letter for this document, we also reviewed DOE's comments. While the thrust of their comments is similar to ours, we are concerned about one conceptual error contained in the DOE comments. It is incorrect to compare and contrast the new sitewide chemical-specific "benchmarks" to the ARARs in the IM/IRA Decision Document. The ARARs in the IM/IRA are finalized and are the performance standards for the OU 2 Walnut Creek treatment facility. Any subsequent sitewide standards that become finalized, even though they may be less stringent for certain constituents, will not impact the standards chosen in the IM/IRA Decision Document. Therefore, contrary to DOE comment #1, it should not be noted that the benchmarks differ from the ARARs. Furthermore, the ARARs in the Walnut Creek IM/IRA are not proposed (DOE comment 1) or potential (DOE comment 2, 3, and 4); they are final.

In addition, DOE comment 2 states that the ARAR for 1,2-DCE was exceeded 36 times in the influent. The data tables in Appendix A show only 35 analyses exceeding the ARAR. DOE comment 4 should be corrected to say that the ARARs were exceeded in the effluent 1 time for TCE and Carbon Tetrachloride and 2 times for Tetrachloroethene. Though the numbers in these comments may need to be changed, the concept behind these comments is correct and ties back to our first comment. Results cannot be overemphasized in this study.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baughman

Gary W. Baughman
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cc: Martin Hestmark, EPA
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